



29 June Meeting
Whtsds to: Shari Kolak
Cc: bucholtp, Richkoster2, Milt Clark



06/30/2004 09:42 AM

Shari,

I personally, and on behalf of the Kalamazoo River Watershed Council, thank you for a very informative meeting last night. I think we advanced the cause. Having Dr. Clark in attendance was extremely helpful. I look forward to his active involvement in the project.

As I mulled over some of the things that were discussed, and "thrown down", I began to formulate a concept that we might explore to resolve some of the timing/delay circumstances driven by the further explication of the site.

With agreement that the dams will be removed, and that bank stabilization, in and of itself is unacceptable, we should be able to commence a removal program which will proceed inside out - from the watercourse toward the margins of the river valley where non-detect has been confirmed.

It is the margin that seems to be the crux of dispute: how far out from the river must sediment (it is all sediment from being formerly lake bottom in the impoundments) be removed to ensure permanence? Areas that are determined to present particular risks from ground water intrusion that could resuspend sediment, or gullies that would allow wash into the river during maximum weather events would be remediated to remove potential recontamination.

In my recent research on EPA websites I found an example, I believe in Texas, where fast track simultaneous design/remediate was used to speed up the project. I think we should consider this approach to demonstrate good faith in resolving issues. I realize that there are constraints and obstructions that exist or will be placed in the way; primarily those items which devolve to counsel. However, a flexible program may provide both some limitation on PRP expenditure (e.g. the river bed and out 25' from the river, but no more), and allow federal, state, and even foundation funding to cover the remainder, either by consolidation and capping, or capping in place. I think we need to think about a more agile approach that will allow us to get underway.

These thoughts are my own and do not represent the position of the Kalamazoo River Watershed Council or any other organization.

Best Regards,

Robert Whitesides